From: ANDERSON Jim M

To: Sean Sheldrake/R10/USEPA/US@EPA; Kristine Koch/R10/USEPA/US@EPA; Eric Blischke/R10/USEPA/US@EPA;

Chip Humphrey/R10/USEPA/US@EPA

Cc: MCCLINCY Matt; ROICK Tom
Subject: RPAC Source Control Letter
Date: 08/17/2007 10:41 AM

## Hey, everybody!

Thanks for meeting yesterday to discuss source control issues at the RPAC site. I understand EPA will revise their draft letter to RPAC based on our discussions; send it to DEQ for review; &, if we can agree on the message, send it to RPAC before our DEQ/EPA/RPAC 8/22 meeting. The purpose of this e-mail is to: 1) help you make those revisions to the letter & 2) help us reach a shared vision or position on RPAC source control in preparation for the 8/22 meeting.

## Revisions to the letter

I suggest EPA's letter state that EPA is concerned with the direction & progress of RPAC source control, & your concern is heightened by the schedule demands of the Arkema Early Action. EPA concludes source control needs to occur at the RPAC property in the source area in a timely manner & that RPAC needs to comprehensively evaluate the need for additional SC quickly so it will sync with the Arkema Early Action schedule, possible additional early actions at Siltronics/Gasco, & the in-water ROD. It's critical that RPAC comprehensively evaluates the groundwater pathway for all RPAC che micals of interest & reaches defensible conclusions regarding the need for source control. EPA expect this comprehensive source control evaluation to be submitted before the end of the year, but preferably sooner.

## Shared vision or position in preparation to the 8/22 meeting

Our message should be the same message as what's in the letter. We should direct RPAC to put the NFA ISCM on hold, & focus on finishing the comprehensive source control evaluation as soon as possible. We should impress upon RPAC the need to sync their source control work with Arkema Early Action, other possible early actions, & the in-water ROD. Furthermore, source control must eliminate/control the threat of recontamination & direct risk to aquatic receptors.

James M. Anderson Manager, Portland Harbor Section DEQ NWR Phone (503) 229-6825 Cell (971) 563-1434 Fax (503) 229-6899